Simon v. Adzilla, Inc [New Media] et al
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EXHIBIT W

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Connectu LLC, Cameron Winklevoss,
Tyler Winklevoss, Howard Winklevoss,
and Divya Narendra

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SANTA CLARA

THE FACEBOOK, INC. Plaintiff, v. CONNECTU LLC, CAMERON WINKLEVOSS, TYLER WINKLEVOSS, HOWARD WINKLEVOSS, DIVYA NARENDRA, AND DOES 1-25, Defendants.	CASE NO. 105 CV 047381 **AMENDMENT TO SECOND AMENDED RESPONSE OF DEFENDANT CONNECTU LLC TO PLAINTIFF'S FIRST SET OF SPECIAL INTERROGATORIES (1-23)**

PROPOUNDING PARTY: **Plaintiff THEFACEBOOK, INC.**

RESPONDING PARTY: **Defendant CONNECTU**

SET NO.: **ONE (1)**

TO PLAINTIFF AND ITS ATTORNEYS OF RECORD:

The above-named party hereby responds, pursuant to California Code of Civil Procedure Section 2030.210(a), to the first set of interrogatories as follows:

RESPONSES AND SPECIFIC OBJECTIONS

14. Because it cited to the Limited Liability Company Operating Agreement--bates number C011285 - 011335, ConnectU interpreted this Interrogatory as calling for the identification of its members from the time the Agreement was executed to the present. ConnectU continues to believe this Interrogatory is vague and ambiguous, compound and complex. If Plaintiff was seeking information regarding ConnectU's membership prior to the date this Agreement was executed, ConnectU does not understand why Plaintiff cited this Agreement in the Interrogatory because this Agreement was executed after ConnectU, LLC was created. ConnectU was created on or about April 6, 2004. If this Interrogatory seeks information regarding ConnectU's membership from the time it was created, ConnectU submits the following amendment to its second amended response to this Interrogatory. From April 6, 2004 to August 5, 2005, the Members of ConnectU were Cameron Winklevoss and Tyler Winklevoss. As of August 5, 2005 and through May 23, 2006, the Members of ConnectU were Cameron Winklevoss, Tyler Winklevoss, Divya Narendra, and Howard Winklevoss. See C011334-C011335. Along with the asserted objections, ConnectU incorporates the balance of its second amended response to this Interrogatory, to the extent this second amended response is consistent with the above.

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VERIFICATION

I, Cameron Winklevoss, declare under penalty of perjury under the laws of the state of California as follows.

I was Co-founder of ConnectU, LLC. ConnectU LLC has now merged into ConnectU, Inc. As a former member of ConnectU LLC and as an officer of ConnectU, Inc., I make this verification for and on its behalf.

I have read the foregoing Amendment to the Second Amended Response of Defendant ConnectU LLC to First Set of Special Interrogatories. The matters herein are true to the best of my knowledge except as to matters stated herein on information and belief, and as to those matters, I believe them to be true.

Executed at Princeton, New Jersey, this 21st day of June, 2006.

Cameron Winklevoss

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Attorneys for Defendant
ConnectU LLC,

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SANTA CLARA

THEFACEBOOK, INC.

Plaintiff,

v.

CONNECTU LLC, CAMERON WINKLEVOSS, TYLER WINKLEVOSS, HOWARD WINKLEVOSS, DIVYA NARENDRA, AND DOES 1-25,

Defendants.

CASE NO. 105 CV 047381

CERTIFICATE OF SERVICE

CERTIFICATE OF SERVICE

I am a citizen of the United States, over the age of 18 years, and not a party to this action. My place of employment and business address is Finnegan, Henderson, Farabow, Garrett, & Dunner, L.L.P., 3300 Hillview Avenue, Palo Alto, California 94304. On June 21, 2006, 2006, I caused a copy of the following documents to be served:

- **AMENDMENT TO SECOND AMENDED RESPONSE OF DEFENDANT CONNECTU LLC TO PLAINTIFF'S FIRST SET OF SPECIAL INTERROGATORIES (1-23)**

to be served on all parties as follows:

Attorneys for Plaintiff
Monte Cooper, Esq.
ORRICK, HERRINGTON & SUTCLIFFE LLP
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Menlo Park, CA 94025
Telephone: 650.614.7400
Facsimile: 650.614.7401

☐ Via First Class Mail
☐ Via Hand Delivery
☐ Via Overnight Courier
☒ Via Facsimile
☒ Via Email

I am readily familiar with my firm's practice for collection and processing of documents by facsimile transmission and email. A true and correct copy of the above document was faxed to the listed facsimile number at our business offices and emailed on June 21, 2006 following ordinary business practice.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct, that I am employed in the office of a member of the bar of this court at whose direction the service was made, and that this declaration was executed on June 21, 2006, at Palo Alto, California.

Rosanna Herrick
Rosanna Herrick